

7.2
10/22/86

I. STANDARD CONDITIONS

A. EFFECT OF PERMIT

The Permittee is allowed to store hazardous waste in accordance with the conditions of this permit. Any storage of hazardous waste not authorized in this permit is prohibited. Compliance with this permit constitutes compliance, for purposes of enforcement, with Subtitle C of RCRA. Issuance of this permit does not convey property rights of any sort or any exclusive privilege; nor does it authorize any injury to persons or property, any invasion of other private rights, or any infringement of State or local law or regulations. Compliance with the terms of this permit does not constitute a defense to any order issued or any action brought under Section 3013 or Section 7003 of RCRA, Section 106(a) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (42 U.S.C. 9606 (a), commonly known as CERCLA), or any other law providing for protection of public health or the environment.

B. PERMIT ACTIONS

This permit may be modified, revoked and reissued, or terminated for cause as specified in 40 CFR §270.41, §270.42, and §270.43. The filing of a request for a permit modification, revocation and reissuance, or termination or the notification of planned changes or anticipated noncompliance on the part of the Permittee does not stay the applicability or enforceability of any permit condition.

C. SEVERABILITY

The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances and the remainder of this permit shall not be affected thereby.

D. DUTIES AND REQUIREMENTS

1. Duty to Comply. The Permittee shall comply with all conditions of this permit, except to the extent and for the duration such noncompliance is authorized by an emergency permit. Any permit noncompliance, other than non-compliance authorized by an emergency permit, constitutes a violation of RCRA and is grounds for enforcement action, permit termination, revocation and reissuance, modification, denial of a permit renewal application, or other appropriate action.

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- (iv) The individuals who performed the analyses;
- (v) The analytical techniques or methods used; and
- (vi) The results of such analyses.

10. Reporting Planned Changes. The Permittee shall give notice to the Regional Administrator of any planned physical alterations or additions to the permitted facility, within 10 days of the decision to make the change.
11. Anticipated Noncompliance. The Permittee shall give advance notice to the Regional Administrator of any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements. Such notification does not waive permittee's duty to comply with this permit pursuant to Paragraph D.1. of Module I.
12. Transfer of Permits. This permit may be transferred to a new owner or operator only if it is modified or revoked and reissued pursuant to 40 CFR §270.41(b)(2) or §270.42(d). Before transferring ownership or operation of the facility during its operating life, the Permittee shall notify the new owner or operator in writing of the requirements of 40 CFR Parts 264 and 270.
13. Compliance Schedules. Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of this permit shall be submitted no later than 14 days following each schedule date.
14. Twenty-four Hour Reporting. The Permittee shall report to the Regional Administrator any noncompliance with the permit which may endanger health or the environment. Any such information shall be reported orally within 24 hours from the time the Permittee becomes aware of the circumstances. This report shall include the following:
 - (a) Information concerning the release of any hazardous waste which may endanger public drinking water supplies.
 - (b) Information concerning the release or discharge of any hazardous waste, or of a fire or explosion at the facility, which could threaten the environment or human health outside the facility. The description of the occurrence and its cause shall include:
 - (i) Name, address, and telephone number of the owner or operator;

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- (ii) Name, address, and telephone number of the facility;
- (iii) Date, time, and type of incident;
- (iv) Name and quantity of materials involved;
- (v) The extent of injuries, if any;
- (vi) An assessment of actual or potential hazard to the environment and human health outside the facility, where this is applicable; and
- (vii) Estimated quantity and disposition of recovered material that resulted from the incident.

A written submission shall also be provided within 5 days of the time the Permittee becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the periods of noncompliance (including exact dates and times); steps taken to minimize impact on the environment; whether the noncompliance has been corrected; and if not, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance. The Permittee need not comply with the five day written notice requirement if the Regional Administrator waives the requirement and the Permittee submits a written report within fifteen days of the time the Permittee becomes aware of the circumstances.

15. Other Noncompliance. The Permittee shall report all other instances of noncompliance not otherwise required to be reported above, at the time monitoring reports, as required by this permit are submitted. The reports shall contain the information listed in condition I.D.14.

16. Other Information. Whenever the Permittee becomes aware that he failed to submit any relevant facts in the permit application, or submitted incorrect information in a permit application or in any report to the Regional Administrator, the Permittee shall promptly submit such facts or information.

E. Signatory Requirement. All reports or other information requested by the Regional Administrator shall be signed and certified as required by 40 CFR §270.11.

F. Confidential Information. The Permittee may claim confidential any information required to be submitted by this permit in accordance with 40 CFR §270.12.

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G. Documents To Be Maintained at Facility Site. The Permittee shall maintain at the facility, until closure is completed and certified by an independent registered professional engineer, the following documents and amendments, revisions and modifications to these documents:

- (1) Waste analysis plan as required by 40 CFR §264.13 and this permit.
- (2) Inspection schedules as required by 40 CFR §264.15(b) and this permit.
- (3) Personnel training documents and records as required by 40 CFR §264.16(d) and this permit.
- (4) Contingency plan as required by 40 CFR §264.53(a) and this permit.
- (5) Closure plan as required by 40 CFR §264.112(a) and cost estimate for facility closure as required by 40 CFR §264.142(d) and financial requirements and this permit.
- (6) Cost estimate for facility closure as required by 40 CFR §264.142(d) and this permit.
- (7) Operating record as required by 40 CFR §264.73 and this permit.

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H. Preparedness and Prevention

1. Required Equipment. At a minimum, the Permittee shall equip the facility with the equipment set forth in the contingency plan, Attachment IV, as required by 40 CFR §264.32.
2. Testing and Maintenance of Equipment. The Permittee shall test and maintain the equipment specified in the previous permit condition as necessary to assure its proper operation in time of emergency.
3. Access to Communications or Alarm System. The Permittee shall maintain access to the communications or alarm system as required by 40 CFR §264.34.
4. Required Aisle Space. At a minimum, the Permittee shall maintain aisle space as required by 40 CFR §264.35.
5. Arrangements with Local Authorities. The Permittee shall attempt to make arrangements with State and local authorities as required by 40 CFR §264.37. If State or local officials refuse to enter into preparedness and prevention arrangements with the Permittee, the Permittee must document this refusal in the operating record.

I. Contingency Plan.

1. Implementation of Plan. The Permittee shall immediately carry out the provisions of the contingency plan, Attachment IV, and follow the emergency procedures described by 40 CFR §264.56 whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents, which threatens or could threaten human health or the environment.
2. Copies of Plan. The Permittee shall comply with the requirements of 40 CFR §264.53.
3. Amendments to Plan. The Permittee shall review and immediately amend, if necessary, the contingency plan, as required by 40 CFR §264.54.
4. Emergency Coordinator. The Permittee shall comply with the requirements of 40 CFR §264.55, concerning the emergency coordinator.

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J. Manifest System. The Permittee shall comply with the manifest requirements of 40 CFR §264.71, §264.72, and §264.76.

K. Recordkeeping and Reporting.

1. Operating Record. The Permittee shall maintain a written operating record at the facility in accordance with 40 CFR §264.73(a), (b)(1), (2), (3), (4), (5), (6), (7), and (8).
2. Biennial Report. The Permittee shall comply with the biennial report requirements of 40 CFR §264.75.

L. Closure.

1. Performance Standard. The Permittee shall close the facility as required by 40 CFR §264.111 and in accordance with the closure plan, Attachment V.
2. Amendment to Closure Plan. The Permittee shall amend the closure plan in accordance with 40 CFR §264.112(b) whenever necessary.
3. Notification of Closure. The Permittee shall notify the Regional Administrator at least 180 days prior to the date he expects to begin closure.
4. Time Allowed For Closure. After receiving the final volume of hazardous waste, the Permittee shall treat or remove from the site all hazardous waste in accordance with the schedule specified in the closure plan, Attachment V. After receiving the final volume of hazardous waste, the Permittee shall complete closure activities in accordance with the schedule specified in the closure plan, Attachment V.
5. Disposal and/or Decontamination of Equipment. The Permittee shall decontaminate and/or dispose of all facility equipment as required by 40 CFR §264.114 and the closure plan, Attachment V.
6. Certification of Closure. The Permittee shall certify that the facility has been closed in accordance with the specifications in the closure plan as required by 40 CFR §264.115.

M. Cost Estimate for Facility Closure. The Permittee's original closure cost estimate, prepared in accordance with 40 CFR §264.142(a), is specified in Attachment VI.

1. The Permittee must adjust the closure cost estimate for inflation within 30 days after each anniversary of the date on which the first closure cost estimate was prepared, as required by 40 CFR §264.142(b).

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2. The Permittee must revise the closure cost estimate whenever there is a change in the facility's closure plan, as required by 40 CFR §264.142(c).
 3. The Permittee must keep at the facility the latest closure cost estimate as required by 40 CFR §264.142(d).
- N. Financial Assurance for Facility Closure. The Permittee shall demonstrate continuous compliance with 40 CFR §264.143 by providing documentation of financial assurance in at least the amount of the cost estimates required by permit condition II.M. Changes in financial assurance mechanisms must be approved by the Regional Administrator pursuant to 40 CFR §264.143.
- O. Liability Requirements. The Permittee shall demonstrate continuous compliance with the requirements of 40 CFR §264.147 including the requirements to have and maintain liability coverage for sudden and accidental occurrences in the amount of at least \$1 million per occurrence with an annual aggregate of at least \$2 million, exclusive of legal defense costs.
- P. Incapacity of Owners or Operators, Guarantors, or Financial Institutions.

The Permittee shall comply with 40 CFR §264.148 whenever necessary.

- O. Financial Assurance and Liability Documentation Requirements. The financial assurance and liability insurance document must be modified as described below.
1. Since the State of Illinois is authorized to administer the RCRA financial assurance requirements, all documentation should be made out to the Director of Illinois Environmental Protection Agency (IEPA). Paragraph 1 of the financial instrument should list all Illinois facilities, and the wording in paragraph 3 should read IEPA instead of EPA and list of all other facilities outside of State of Illinois.
 2. All documentation must be original, with original signatures. Copies should be submitted U.S. EPA, Region V offices.
 3. The existence liability insurance covering sudden occurrence must be demonstrated.

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III. STORAGE IN CONTAINERS

A. Waste Identification. The Permittee may store the following hazardous wastes in containers at the facility, subject to the terms of this permit:

1. Spent halogenated solvents used in degreasing (F001)
2. Spent halogenated solvents (F002)
3. Mineral sprits
4. Immersion cleaner

The above wastes may be stored in the two drum storage facilities described in the application subject to the conditions contained in Attachment VII.

No more than 600 55-gallon drums of hazardous waste can be stored in the permitted area at any time.

B. Condition of Containers. If a container holding hazardous waste is not in good condition (e.g., severe rusting, apparent structural defects) or if it begins to leak, the Permittee shall transfer the hazardous waste from such container to a container that is in good condition or otherwise manage the waste in compliance with the conditions of this permit.

C. Compatibility of Waste with Containers. The Permittee shall assure that the ability of the container to contain the waste is not impaired as required by 40 CFR §264.172.

D. Management of Containers. The Permittee shall manage containers as required by 40 CFR §264.173.

E. Special Requirements for Ignitable or Reactive Waste. The Permittee shall not locate containers holding ignitable or reactive waste within 15 meters (50 feet) of the facility's property line.

F. Special Requirements for Incompatible Waste.

The Permittee shall not place hazardous waste in an unwashed container that previously held an incompatible waste or material.

G. Containment. The Permittee shall maintain the containment system in accordance with the requirements of 40 CFR §264.175.

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IV. STORAGE IN TANKS

e Identification. The Permittee may store the following hazardous wastes in tanks, subject to the terms of this permit:

Spent halogenated solvents used in degreasing

Spent halogenated solvents

General sprits

Immersion cleaner

Still bottoms and sludges from the recovery of the solvents in 1-4 above.

following above ground tanks are permitted for storage of the above wastes: 7, 11, 113, 72, 73, 8, 30, 121, 136, 137, 138, 80, 82.

following underground tanks are permitted for storage of the above wastes: 26, 27, 36, 37, 108, 112, 133, 140, 141, 142, 139, 148.

or the above tanks is further subject to the conditions specified in Attachment VIII.

more than 142,000 gallons of hazardous waste can be stored in the permitted tank storage area at any time.

Design of Tanks. The Permittee shall construct maintain tanks as required by 40 CFR §264.191. The minimum allowable thickness for above ground tanks are as follows:

<u>Carbon Steel</u>	<u>Stainless Steel</u>
(in.)	(in.)
Shell 0.167	0.115
Bottom 0.240	0.158
Top 0.123	0.086

The minimum allowable shell thickness, excluding coating or lining,

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cial Requirements for Ignitable or Reactive Wastes.

The Permittee shall not place ignitable or reactive waste in a tank unless the procedures described in Attachment VIII are followed, as required by 40 CFR 264.198(a).

The Permittee shall document compliance with IV. D.1 as required by 40 CFR 264.17(c) and place this documentation in the operating record (condition II. K.1).

The Permittee shall maintain buffer zones around covered tanks as specified in Attachment VIII, as required by 40 CFR §264.198(b).

cial Requirements for Incompatible Wastes.

The Permittee shall not place incompatible wastes in the same tank or place hazardous waste in a tank that previously held an incompatible waste or material.

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ATTACHMENT VII

SPECIAL CONDITIONS FOR CONTAINER STORAGE

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Special Conditions for Drum Storage

The volume of liquid in Tank No. 148 shall be checked at least once each operating day. To insure compliance with 40 CFR 264.175(b)(3), this tank must always have sufficient additional capacity to contain a volume equal to 10% of the total volume of material stored in containers in the drum storage building.

All drums in both drum storage areas must be labeled so it is obvious which drums are subject to the regulations in Sections 122 and 264, and to the conditions of this permit.

Adequate aisle space must be maintained in loading dock and trunk ramp drum storage site to allow unobstructed movement of personnel, fire protection equipment, spill control equipment and decontamination equipment. The drum arrangement indicated on Figure IV-4, which was submitted as part of the application would not allow access to all portions of the facility in the event of an emergency.

To insure compliance with 40 CFR 264.175(b)(2), containers located at the base of the unloading ramp must be elevated to prevent contact with any accumulated liquids. It is recognized that precipitation and spills from the entire ramp area will accumulate there.

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ATTACHMENT VIII

SPECIAL CONDITIONS FOR TANK STORAGE

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SPECIAL CONDITIONS FOR STORAGE IN TANKS

The level of waste in each tank shall be measured each operating day. Before any waste is transferred into a storage tank, the Permittee shall make certain there is adequate capacity remaining in the tank to minimize the potential for overfilling. The secondary containment dikes around the tanks must be maintained to contain any liquids in the event overfilling occurs.

All tanks containing flammable or combustible wastes shall be maintained and operated in accordance with the Codes and Standards of the National Fire Protection Association (Number 30).

The Permittee shall develop and follow an inspection program adequate to detect leaks, cracks, corrosion or erosion which may lead to cracks or leaks, or wall thinning to less than the thickness required in condition IV-2. These procedures shall include emptying the tank to allow entry and inspection of the interior sides and bottom for evidence of corrosion and erosion.

The Permittee shall continue to plan and eventually implement a groundwater restoration program in accordance with any agreements made with the State of Illinois.

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Appendix GN

Section A: Scope

1. Complete this Appendix if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

Section B: MANIFEST REQUIREMENTS (Part 722, Subpart B)

	YES	NO	NI	Remarks
(1) Does the operator have copies of the manifest available for review?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(2) Manifests for shipments in past _____ months were examined. The approx. number of manifests shipments during that period were <u>Numerous</u> .				
(3) Do the manifest forms examined contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements).				RECEIVED OCT 22 1986 IEPA-DLPC
a. Manifest document number?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b. Name, mailing address, telephone number, and EPA ID number of Generator	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c. Name and EPA ID Number of Transporter(s)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d. Name, address, and EPA ID Number Designated permitted facility and alternate facility?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
e. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
f. The total quantity of waste(s) and the type and number of containers loaded?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
g. Required certification?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
h. Required signatures?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(4) Reportable exceptions				
a. For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has <u>NOT</u> received a signed copy from the designated facility within 35 days of the date of shipment. <u>None</u>				
b. For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (35 Ill. Adm. Code 722.142) to the Regional Administrator. <u>None</u>				

Section C: PRE-TRANSPORT REQUIREMENTS (Part 722, Subpart C)

	YES	NO	NI	REMARKS
1. Is waste packaged in accordance with DOT regulations? (Required prior to movement of hazardous waste off-site)	_____	_____	<input checked="" type="checkbox"/>	Waste not ready for transportation
2. Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required for movement of hazardous waste off-site)	_____	_____	<input checked="" type="checkbox"/>	↓
3. If required, are placards available to transporters of hazardous waste?	_____	_____	<input checked="" type="checkbox"/>	
4. On-site accumulation of generated wastes. A HWMF may accumulate hazardous waste it generates either (A) in its storage facility [725.101(b)] or (B) in accordance with 35 Ill. Adm. Code 722.134 [See 725.101(c)(7)]. Option B restricts all accumulation to tanks and containers. If the installation elects option A, check this box <input type="checkbox"/> and skip to Section D. If the installation elects option B, complete the following observations:				
a. Is each container clearly marked with the start of accumulation date?	<input checked="" type="checkbox"/>	_____	_____	
b. Have more than 90 days elapsed since the date inspected in (a)?	_____	<input checked="" type="checkbox"/>	_____	
c. Do wastes remain in accumulation tanks for more than 90 days?	_____	_____	<input checked="" type="checkbox"/>	Tanks used for storage of haz. waste generated on site. Only containers are used
d. Is each container and tank labeled or marked clearly with the words "Hazardous Waste"?	yes for containers	_____	<input checked="" type="checkbox"/>	

Section D: - RECORDKEEPING AND REPORTING (Part 722, Subpart D)

	YES	NO	NI	REMARKS
1. Are all tests results and analyses needed for hazardous waste determinations retained for at least three years?	<input checked="" type="checkbox"/>	_____	_____	

Section E: INTERNATIONAL SHIPMENTS (Part 722, Subpart E)

1. Has the installation imported or exported Hazardous Waste?	_____	<input checked="" type="checkbox"/>	_____	No international shipments.
(If answered Yes, complete the following as applicable).				
a. Exporting Hazardous Waste; has a generator:				

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	YES	NO	NI	Remarks
i. Notified the Administrator in writing?	___	___	<input checked="" type="checkbox"/>	N/A
ii. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?	___	___	<input checked="" type="checkbox"/>	
iii. Met the Manifest requirements?	___	___	<input checked="" type="checkbox"/>	
b. Importing Hazardous Waste; has the generator met the manifest requirements?	___	___	<input checked="" type="checkbox"/>	

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Appendix TR

YES NO NI Remarks

Section A: SCOPE:

1. Complete this Appendix if the owner or operator transports hazardous waste subject to 35 Ill. Adm. Code 723.110.
2. Does the transporter transport hazardous waste into the U.S. from abroad? ✓
3. Does the transporter transport hazardous waste out from the U.S.? ✓
4. Does the transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container? ✓

Section B: MANIFEST SYSTEM AND RECORDKEEPING (Part 723, Subpart B)

1. Are copies of completed manifests available for review and retained for three years. ✓
2. Estimate the number of manifests for shipments completed during the past 6 months. Numerous - More than a hundred.
3. Examine a representative number of manifests. Indicate number examined. Approx 3 dozen.
4. Did transporter properly sign and date the manifests examined? ✓
5. Do any manifests indicate shipments delivered to other than the designated facility? ✓
If (5) is "no," skip 6 and 7. ✓ N/A
6. Do any manifests indicate shipments delivered to other than an alternate facility? ✓ N/A
7. Are shipments delivered to alternate facilities only because emergency prevents delivery to the designated facility? ✓ N/A

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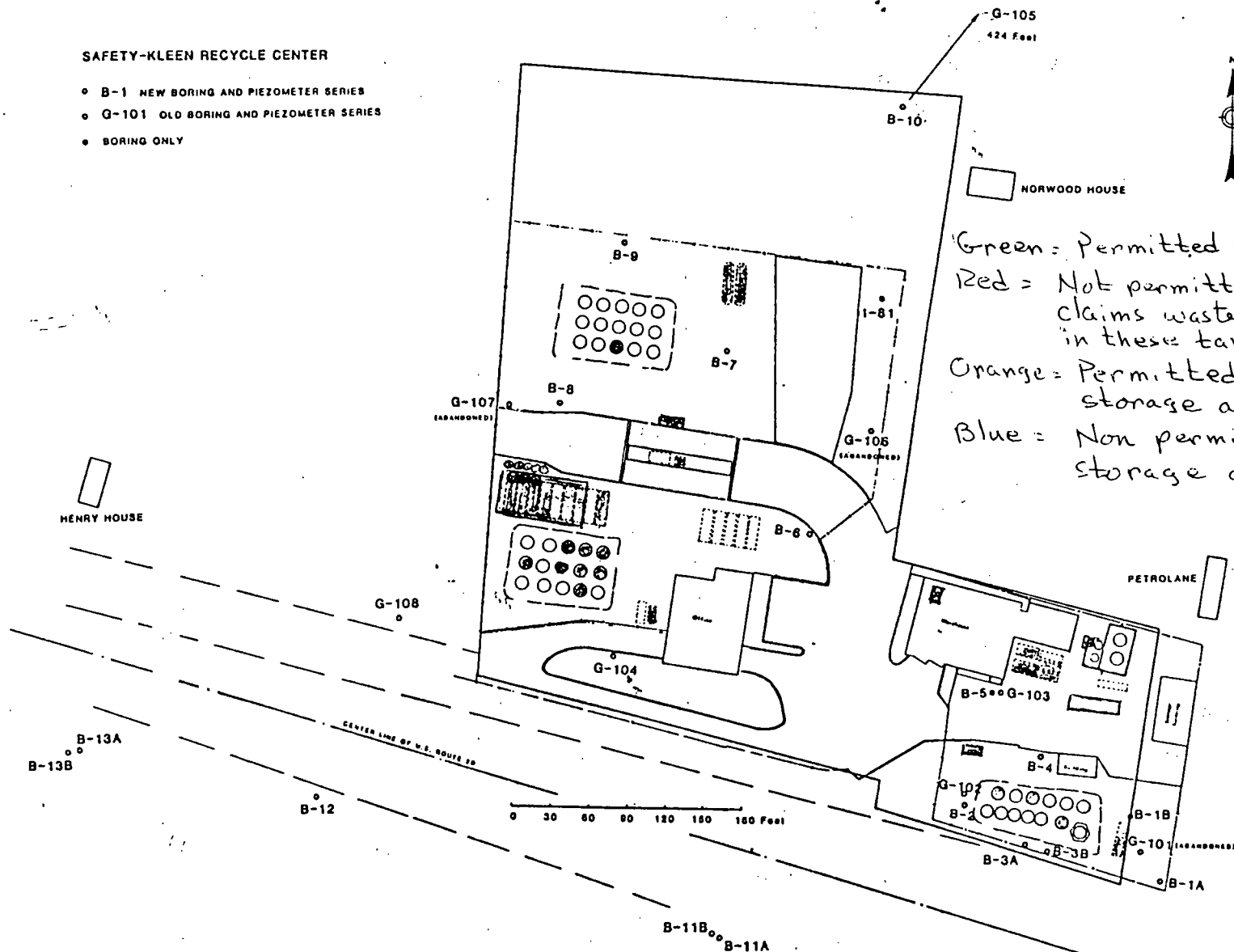
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SAFETY-KLEEN RECYCLE CENTER

- B-1 NEW BORING AND PIEZOMETER SERIES
- G-101 OLD BORING AND PIEZOMETER SERIES
- BORING ONLY



Green = Permitted Tanks
 Red = Not permitted (Operator claims waste being stored in these tanks).
 Orange = Permitted container storage areas
 Blue = Non permitted container storage area.

ELGIN RECYCLE CENTER PLOT PLAN

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NARRATIVE

This site was issued a RCRA operating permit on March 14, 1984, effective April 13, 1984. The permit allows the firm to store hazardous waste in containers and tanks. The permit identifies two container storage areas, 14 above ground storage tanks and 12 below ground storage tanks. (Refer to the site sketch for the location of the permitted tanks and areas.)

In addition to storage of hazardous waste, the firm generates hazardous wastes as a result of its operations. Wastes generated from these operations are either stored in tanks or accumulated in a covered sludge box. Wastes in the containers are removed from the facility approximately twice a week.

The firm also transports hazardous wastes, moving bulk or containerized waste from its service center or customers to the facility for processing.

The wastes the firm is permitted to store include the listed hazardous wastes F001 and F002 (halogenated solvents), mineral spirits (characteristically hazardous for flash point) and immersion cleaner (a proprietary mixture of solvents).

The maximum volume of waste permitted to be stored in tanks is 142,000 gallons. On August 8, 1983 the firm submitted a request to increase this capacity to 161,600 gallons. The request was made in the form of a letter and included a revised Part A. This request to increase the capacity was to add the "generated waste tanks (sludge and wastewater tanks)" to the total. The tank numbers were not included in this submission, but based on an August 10, 1982 drawing they are for the "sludge", #26, 27, 108, 148 and for the "wastewater", #112, 36, and 37. Since all of these tanks were included in the permit, it is not clear which additional tanks were meant.

During the inspection, the following tanks were identified as waste storage tanks by Mr. Eisenhower:

Above Ground: 7, 11, 113, 72, 73, 8, 30, 121, 136, 137, 138, 80, 6, 127, 104, 3, 81, 82, 106, 128, 129, 74, 75, and 76.

Below Ground: 26, 27, 28, 36, 37, 108, 112, 133, 140, 141, 142, 139, 148, 119, 109, 130, 131, and 132.

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Narrative

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The total indicated volume of these tanks, from the 1982 drawing, is 360,000 gallons. However, during the inspection Mr. Walczynski indicated that some of these tanks might be process tanks - i.e., the tanks are not ones which waste is initially pumped into before processing. He said that he and the plant manager, Mr. Eisenhower, would review the above list and identify those tanks actually used for waste storage.

During the inspection containers of hazardous waste were being stored in four areas. As previously stated, the facility permit identifies two container storage areas. There is no indication that the firm has requested an amendment to include the two additional storage areas, which appears to be the "truck unloading tunnel" and the immersion cleaner warehouse.

The facility closure plan does not include these additional tanks or container storage areas. Mr. Walczynski indicated that there had been an upward adjustment in the closure cost estimate to include the cost of closure of additional storage tanks and container storage areas. The financial assurance will be adjusted in March, 1987 to reflect these additional costs according to Mr. Walczynski.

During the inspection it was also noted that the firm did not conduct an annual review of training in hazardous waste management for some employees. No other apparent violations were observed during the inspection. The facility closure plan and financial assurance estimates were discussed with the facility representatives during the inspection. Mr. Walczynski indicated that the firm's resubmission for a new permit which is due 180 days before the expiration of the current permit (October 16, 1986) would include the additional tank and container storage and that the closure plan and financial assurance estimates would be adjusted accordingly.

As required by Attachment VIII, Special Conditions for Tank Storage, the facility is continuing to implement its groundwater restoration program. At the time of the inspection, the firm was seeking permission from Elgin to discharge the groundwater to the City POTW. According to Mr. Walczynski, bench scale tests have been acceptable and the firm will be conducting pilot scale evaluations which they anticipate will be completed by mid October, 1986.

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The storage of wastes in the unpermitted tanks and in the unpermitted container storage areas and the failure to conduct annual review training constitute violations of the facility operating permit.

Specifically, these include:

- Failure to maintain personnel training documents and records as required by 40 CFR 264.16(d) (35 Ill. Adm. Code 724.116(d). Module I, Paragraph G, Subparagraph 3.
- Failure to conduct personnel training (including annual refresher training) as required by 40 CFR 264.16 (35 Ill. Adm. Code 724.116). Module II, Paragraph F.
- Storing hazardous waste in containers in two areas not described in the permit application. Module III, Paragraph A.
- Storing hazardous waste in tanks not identified in the permit application. Module IV, Paragraph A.
- Noncompliance with all conditions of the operating permit. Module I, Paragraph D, Subparagraph 1.
- Failure to report the use of additional tanks and areas to store bulk and containerized hazardous waste. Module I, Paragraph D, Subparagraph 10.
- Failure to notify the Regional Administrator of the use of additional tanks and areas to store bulk and containerized hazardous waste. Module I, Paragraph D, Subparagraph 11.
- Failure to submit information related to additional tanks and container storage areas used to store hazardous waste. Module I, Paragraph D, Subparagraph 16.

During the inspection, no violations of the standards solely applicable to the generation and transportation of hazardous waste were observed.

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ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

A. Vollmer
MEMORANDUM

TO: A. Vollmer DATE: 10/7/86

FROM: C. Gould ☐ Information onlySUBJECT: 0314380001 / Cook Co / Safety Kleen Corp / FID 000805911 ☐ Response requested

Compliance File

The subject facility was inspected 9/30/86 for compliance with 35 Ill. Adm. Code 264 and ~~the~~ its Operating Permit.

During the inspection it was determined that the facility was storing hazardous wastes in tanks and container storage areas which were not permitted.

The facility closure plan and financial assurance do not address the closure or costs of closure of these additional storage areas and tanks.

Enclosed is a copy of the inspection report. Request that this facility's closure plan and financial assurance documents be reviewed to determine compliance with the facility operating permit and with the requirements of 35 Ill. Adm. Code 724, Subparts G and H.

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cc: N. Region, Div. File, Michelle Tebrugge

RCRA Inspection Report

I. General Information

USEPA Number: ILD000805911 - IEPA Number: 0314380001

Facility Name and Address:

Safety Kleen Corporation

1500 E. Villa Street Cook County

Elgin, Illinois 60120 Telephone: 312/697-1834

Facility Operator Name and Address:

Safety Kleen Corporation

1500 E. Villa Street Cook County

Elgin, Illinois 60120 Telephone: 312/697-1834

Facility Owner Name and Address:

Safety Kleen Corporation

655 Big Timber Road Kane County

Elgin, Illinois 60120 Telephone: 312/697-8460

Notified As: Gen, Trans, TSD - Regulated As: Gen, Trans, TSD.

Region: 2 - Date of Inspection: 9/30/86

Time: From 10:00 a.m. to 12:30 p.m.

Weather Conditions: Rain, approximately 60°F.

Preparer Information:

Clifford Gould

IEPA/EPS

312/345-9780

Person Interviewed

Title

Telephone

Mr. Larry Eisenhauer

Facility Manager

312/697-1824

Mr. Stanley A. Walczynski

Env. Engineer

312/697-8460

Inspection Participants

Agency/Title

Telephone

Clifford Gould

IEPA/EPS

312/345-9780

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II. Scope of Inspection

Permitted Processes (Facility Permit issued March 14, 1984)

- S01 Storage in Containers
- S02 Storage in Tanks

Other Activities

- Generator
- Transporter

No hazardous waste processes have been omitted from the facility Part A and Operating Permit.

No hazardous waste processes identified in the facility Part A and Operating Permit appear eligible for exclusion per 35 Ill. Adm. Code 724.106(f).

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Appendix GN

Section A: Scope

1. Complete this Appendix if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

Section B: MANIFEST REQUIREMENTS (Part 722, Subpart B)

	YES	NO	NI	Remarks
(1) Does the operator have copies of the manifest available for review?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(2) Manifests for shipments in past <u> </u> months were examined. The approx. number of manifests shipments during that period were <u>Numerous</u> .				
(3) Do the manifest forms examined contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements).				
a. Manifest document number?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b. Name, mailing address, telephone number, and EPA ID number of Generator	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c. Name and EPA ID Number of Transporter(s)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d. Name, address, and EPA ID Number Designated permitted facility and alternate facility?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
e. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
f. The total quantity of waste(s) and the type and number of containers loaded?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	RECEIVED OCT 22 1986 IEPA-DLPC
g. Required certification?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
h. Required signatures?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(4) Reportable exceptions				
a. For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has NOT received a signed copy from the designated facility within 35 days of the date of shipment. <u>None</u>				
b. For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (35 Ill. Adm. Code 722.142) to the Regional Administrator. <u>None</u>				

Section C: PRE-TRANSPORT REQUIREMENTS (Part 722, Subpart C)

	YES	NO	NI	REMARKS
1. Is waste packaged in accordance with DOT regulations? (Required prior to movement of hazardous waste off-site)	_____	_____	✓	Waste not ready for transport.
2. Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required for movement of hazardous waste off-site)	_____	_____	✓	↓
3. If required, are placards available to transporters of hazardous waste?	_____	_____	✓	
4. On-site accumulation of generated wastes. A HWMF may accumulate hazardous waste it generates either (A) in its storage facility [725.101(b)] or (B) in accordance with 35 Ill. Adm. Code 722.134 [See 725.101(c)(7)]. Option B restricts all accumulation to tanks and containers. If the installation elects option A, check this box <input type="checkbox"/> and skip to Section D. If the installation elects option B, complete the following observations:				
a. Is each container clearly marked with the start of accumulation date?	✓	_____	_____	_____
b. Have more than 90 days elapsed since the date inspected in (a)?	_____	✓	_____	_____
c. Do wastes remain in accumulation tanks for more than 90 days?	_____	_____	✓	Tanks used for storage of haz. waste generated on site. Only containers are to accumulate haz. waste generated on site.
d. Is each container and tank labeled or marked clearly with the words "Hazardous Waste"?	yes for containers, NI/N/A for tanks.	_____	✓	_____

Section D: - RECORDKEEPING AND REPORTING (Part 722, Subpart D)

YES	NO	NI	REMARKS
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1. Are all tests results and analyses needed for hazardous waste determinations retained for at least three years?

✓	_____	_____	_____
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Section E: INTERNATIONAL SHIPMENTS (Part 722, Subpart E)

1. Has the installation imported or exported Hazardous Waste?

(If answered Yes, complete the following as applicable).

_____	✓	_____	No international shipments.
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- a. Exporting Hazardous Waste; has a generator:

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	YES	NO	NI	Remarks
i. Notified the Administrator in writing?	—	—	✓	N/A
ii. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?	—	—	✓	↓
iii. Met the Manifest requirements?	—	—	✓	
b. Importing Hazardous Waste; has the generator met the manifest requirements?	—	—	✓	↓

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Appendix TR

YES NO NI Remarks

Section A: SCOPE:

1. Complete this Appendix if the owner or operator transports hazardous waste subject to 35 Ill. Adm. Code 723.110.
2. Does the transporter transport hazardous waste into the U.S. from abroad? ☒ YES ☐ NO ☐ NI
3. Does the transporter transport hazardous waste out from the U.S.? ☒ YES ☐ NO ☐ NI
4. Does the transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container? ☒ YES ☐ NO ☐ NI

Section B: MANIFEST SYSTEM AND RECORDKEEPING (Part 723, Subpart B)

1. Are copies of completed manifests available for review and retained for three years. ☒ YES ☐ NO ☐ NI
2. Estimate the number of manifests for shipments completed during the past 6 months. Numerous - More than a hundred.
3. Examine a representative number of manifests. Indicate number examined. Approx 3 dozen.
4. Did transporter properly sign and date the manifests examined? ☒ YES ☐ NO ☐ NI
5. Do any manifests indicate shipments delivered to other than the designated facility? ☒ YES ☐ NO ☐ NI
- If (5) is "no," skip 6 and 7. ☒ YES ☐ NO ☐ NI
6. Do any manifests indicate shipments delivered to other than an alternate facility? ☒ YES ☐ NO ☐ NI
7. Are shipments delivered to alternate facilities only because emergency prevents delivery to the designated facility? ☒ YES ☐ NO ☐ NI

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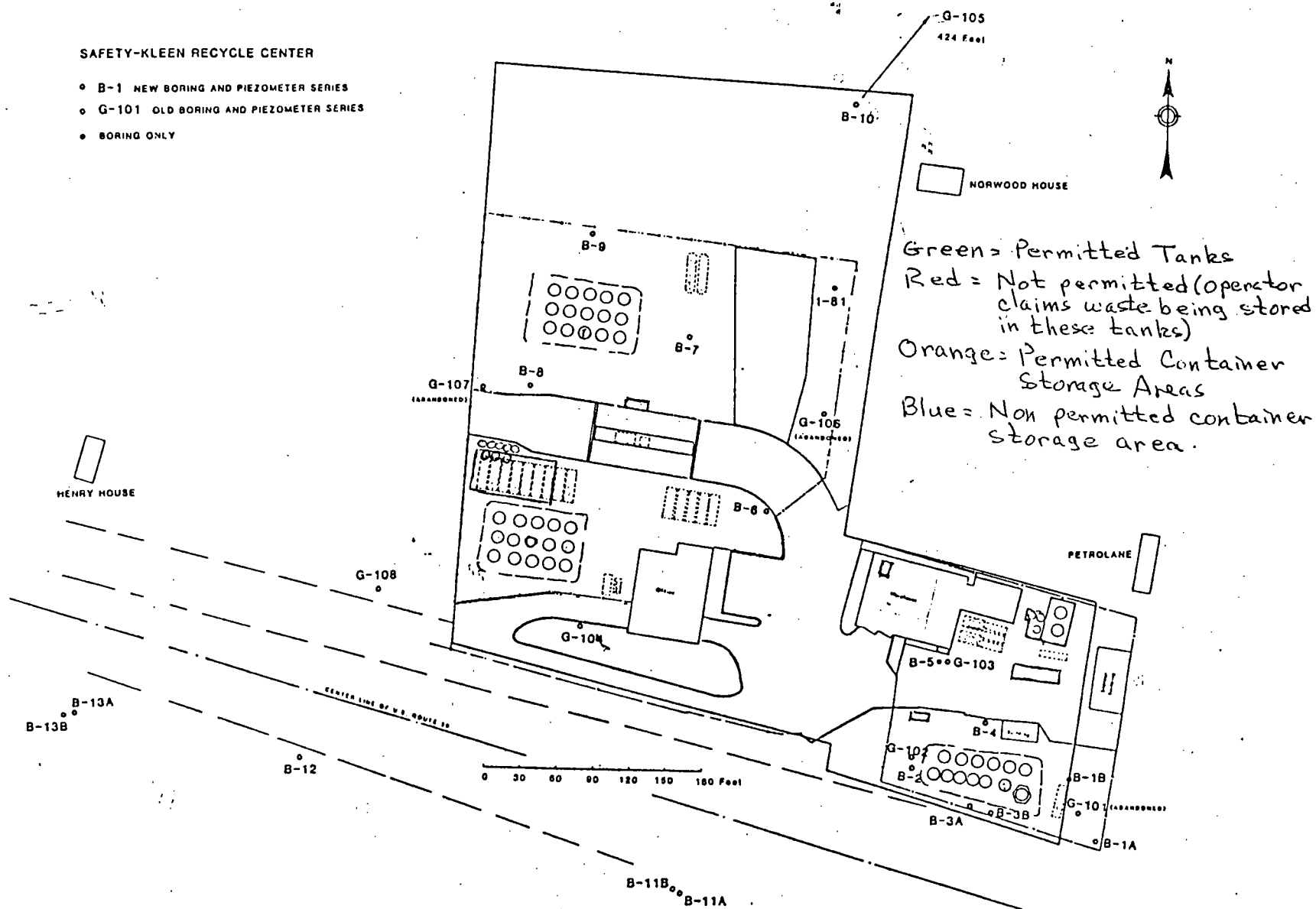
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SAFETY-KLEEN RECYCLE CENTER

- B-1 NEW BORING AND PIEZOMETER SERIES
- G-101 OLD BORING AND PIEZOMETER SERIES
- BORING ONLY



ELGIN RECYCLE CENTER PLOT PLAN

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Narrative
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The total indicated volume of these tanks, from the 1982 drawing, is 360,000 gallons. However, during the inspection Mr. Walczynski indicated that some of these tanks might be process tanks - i.e., the tanks are not ones which waste is initially pumped into before processing. He said that he and the plant manager, Mr. Eisenhower, would review the above list and identify those tanks actually used for waste storage.

During the inspection containers of hazardous waste were being stored in four areas. As previously stated, the facility permit identifies two container storage areas. There is no indication that the firm has requested an amendment to include the two additional storage areas, which appears to be the "truck unloading tunnel" and the immersion cleaner warehouse.

The facility closure plan does not include these additional tanks or container storage areas. Mr. Walczynski indicated that there had been an upward adjustment in the closure cost estimate to include the cost of closure of additional storage tanks and container storage areas. The financial assurance will be adjusted in March, 1987 to reflect these additional costs according to Mr. Walczynski.

During the inspection it was also noted that the firm did not conduct an annual review of training in hazardous waste management for some employees. No other apparent violations were observed during the inspection. The facility closure plan and financial assurance estimates were discussed with the facility representatives during the inspection. Mr. Walczynski indicated that the firm's resubmission for a new permit which is due 180 days before the expiration of the current permit (October 16, 1986) would include the additional tank and container storage and that the closure plan and financial assurance estimates would be adjusted accordingly.

As required by Attachment VIII, Special Conditions for Tank Storage, the facility is continuing to implement its groundwater restoration program. At the time of the inspection, the firm was seeking permission from Elgin to discharge the groundwater to the City POTW. According to Mr. Walczynski, bench scale tests have been acceptable and the firm will be conducting pilot scale evaluations which they anticipate will be completed by mid October, 1986.

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The storage of wastes in the unpermitted tanks and in the unpermitted container storage areas and the failure to conduct annual review training constitute violations of the facility operating permit.

Specifically, these include:

- Failure to maintain personnel training documents and records as required by 40 CFR 264.16(d) (35 Ill. Adm. Code 724.116(d). Module I, Paragraph G, Subparagraph 3.
- Failure to conduct personnel training (including annual refresher training) as required by 40 CFR 264.16 (35 Ill. Adm. Code 724.116). Module II, Paragraph F.
- Storing hazardous waste in containers in two areas not described in the permit application. Module III, Paragraph A.
- Storing hazardous waste in tanks not identified in the permit application. Module IV, Paragraph A.
- Noncompliance with all conditions of the operating permit. Module I, Paragraph D, Subparagraph 1.
- Failure to report the use of additional tanks and areas to store bulk and containerized hazardous waste. Module I, Paragraph D, Subparagraph 10.
- Failure to notify the Regional Administrator of the use of additional tanks and areas to store bulk and containerized hazardous waste. Module I, Paragraph D, Subparagraph 11.
- Failure to submit information related to additional tanks and container storage areas used to store hazardous waste. Module I, Paragraph D, Subparagraph 16.

During the inspection, no violations of the standards solely applicable to the generation and transportation of hazardous waste were observed.

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ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

Div. File

MEMORANDUM

TO: A Vollmer

DATE: 10/7/86

FROM: C. Gould

☐ Information only

SUBJECT: 314320001 / Cook Co / Safety Kleen Corp / IL 300205711

☐ Response requested

Compliance File

The subject facility was inspected 7/30/86 for compliance with 35 Ill Adm Code 264 and ~~the~~ its Operating Permit.

During the inspection it was determined that the facility was storing hazardous wastes in tanks and container storage areas which were not permitted.

The facility closure plan and financial assurance do not address the closure or cost of closure of these additional storage areas and tanks.

Enclosed is a copy of the inspection report. Request that this facility's closure plan be reviewed for compliance with the facility planning and and the requirements of 35 Ill Adm Code 264, Sections 2 and 11.

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cc. N. Region Div. File Michael Tebrasse



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

MEMORANDUM

TO: A. Vollmer

DATE: 10/7/86

FROM: C. Gould

☐ Information only

SUBJECT: 0314380001 / Cook Co / Safety Kleen Corp / ILL 000805911

☐ Response requested

Compliance File

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During the inspection it was determined that the facility was storing hazardous wastes in tanks and container storage areas which were not permitted.

The facility closure plan and financial assurance do not address the closure or cost of closure of these additional storage areas and tanks.

Enclosed is a copy of the inspection report. Request that this facility's closure plan and financial assurance documents be reviewed to determine compliance with the facility operating permit and with the requirements of 35 Ill. Adm. Code 724, Subparts G and H.

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cc: N. Region, Div. File, Michelle Tebrugge

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